

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

JOSEPH COOPER

Case No.

21-mj-17042 (SAK)

*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 20, 2020 in the county of Gloucester in the  
District of New Jersey, the defendant(s) violated:

*Code Section*

18 U.S.C. §§ 2252A(a)(5)(B) and  
(b)(2).

*Description of Offenses*

Possession of child pornography. See Attachment A.

This criminal complaint is based on these facts:

See Attachment B

☒ Continued on the attached sheet.

*Laura Hurley*  
*Complainant's signature*

Special Agent Laura Hurley, HSI

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephone (specify reliable electronic means).

Date: 08/19/2021


*Sharon A. King*  
*Judge's signature*

City and state: District of New Jersey

Hon. Sharon A. King, U.S. Magistrate Judge

*Printed name and title*

CONTENTS APPROVED  
UNITED STATES ATTORNEY

By:   
Daniel A. Friedman  
Assistant U.S. Attorney

Date: August 19, 2021

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**ATTACHMENT A**  
**Possession of Child Pornography**

On or about October 20, 2020, in Gloucester County, in the District of New Jersey, and elsewhere, the defendant,

**JOSEPH COOPER,**

did knowingly possess and attempt to possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), depicting prepubescent minors who had not attained 12 years of age, which images had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which were produced using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer.

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In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

**ATTACHMENT B**

I, Laura Hurley, being duly sworn, do hereby state as follows:

1. I am a special agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), assigned to the Cherry Hill, New Jersey office.
2. The information provided in this Affidavit is based on my personal knowledge, my training and experience, my review of reports and records, and information learned from other law enforcement agents, witnesses and documents. Except as otherwise indicated, the actions, conversations, and statements of others identified in this Affidavit are reported in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.
3. This Affidavit is submitted for the limited purpose of setting forth probable cause for the issuance of the requested criminal complaint and arrest warrant. For that reason, I have not included every fact known to me regarding this investigation. Rather, I have set forth only those facts which I believe are necessary to establish probable cause to support issuance of the requested criminal complaint and arrest warrant.
4. On October 20, 2020, law enforcement agents executed a search warrant at the residence of JOSEPH COOPER, 401 N. Main Street, Apartment 242A, Williamstown, New Jersey. The warrant authorized the search and seizure of evidence of distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2252 and 2252A, including computers and storage media located at the residence.
5. The search of the residence yielded various computers, hard drives, and electronic devices, including:
  - a. One (1) HP Pavilion desktop computer, Model 590-p0033w, bearing serial number 8CG8463022, which contained one (1) Toshiba 1-terabyte hard drive, Model DT01ACA100, bearing serial number X8HZ4Y9MS; and
  - b. One (1) Lenovo H420 desktop computer, Model 77523FU, bearing serial number ES07896338, which contained one (1) Seagate Barracuda 1-terabyte hard drive, Model ST31000524AS, bearing serial number 9VPFAC26.

(together, the "Computers")

6. A forensic search of the Computers revealed the presence of more than 50 unique videos and 200 unique images of child pornography, as defined in 18 U.S.C. § 2256(8), including depictions of prepubescent minors or minors who had not attained 12 years of age engaged in sexually explicit conduct.

7. A description of three of the videos follows:<sup>1</sup>

- a. File Path: ubuntu.vdi - Partition 1 (EXT-family, 98.7 GB)\home\joec\.file\[file 1].avi: This video is approximately four minutes eight seconds (00:04:08) seconds in length and depicts a prepubescent female child. At approximately 00:00:31, the prepubescent female child lays down on her back and pulls her underwear to the side, exposing her vagina to the camera. At approximately 00:01:08, the female child turns around on her knees and spreads her buttocks with her hands, exposing her vagina and anus to the camera. At approximately 00:02:00, the female child is seen nude in a bathroom setting wearing only knee-high black boots. At approximately 00:02:26, the child performs fellatio on a male. At approximately 00:03:51, the male ejaculates onto the face and mouth of the child.
- b. File Path: ubuntu.vdi - Partition 1 (EXT-family, 98.7 GB)\home\joec\.file\[file 2].mp4: This video is approximately ten minutes thirteen seconds (00:10:13) in length and depicts a nude prepubescent female child. The video begins with the child bent over on her hands and knees, exposing her vagina and anus to the camera. At approximately 00:00:16, a male anally penetrates the child with a white phallic-shaped object. At approximately 00:05:11 the male anally penetrates the child with his erect penis. At approximately 00:07:10, the child turns over on her hands and knees while the male anally penetrates her with the white phallic-shaped object again. At approximately 00:09:02, the male vaginally penetrates the child with his erect penis.
- c. File Path: H420\_joehc\_ubuntu.vdi - Partition 1 (EXT-family, 117.26 GB)\home\joeco\.file\[file 3].MP4: This video is approximately five minutes fifty-one (00:05:51) seconds in length and depicts a prepubescent female child. The video begins with the child removing her underwear and bending over a chair, exposing her anus to the camera. An adult male then

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<sup>1</sup> The filenames in Paragraph 7 are known to me. The filenames are omitted from this affidavit to avoid publicly identifying any victims in this matter.

enters the room and orally copulates the child's anus and genitalia. At approximately 00:00:46, the child lays down onto her stomach on a sofa while the adult male kisses her buttocks. At approximately 00:01:14, the adult male is seen nude while rubbing his erect penis against the buttocks and genitalia of the child. At approximately 00:02:16, the adult male manually stimulates the child's vagina with his hand. At approximately 00:03:12 the child manually stimulates the adult male's penis with her hand. At approximately 00:05:01 the child is seen completely nude seated on a chair.

8. Law enforcement agents examining the Computers also located more than 1,000 logs from an Internet-based client-server chatting protocol. The logs document chats between a user with username "joeb" and other users. In the chat logs, "joeb" states that he is a 74-year-old male and discusses engaging in sexual acts with prepubescent children. COOPER was born in 1946 and was 74-years-old at the time the search warrant was executed.

9. The Computers also contained two video files depicting COOPER seated in a chair in the room in his apartment where the Computers were located. COOPER appears to be looking at a computer screen.

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10. Upon executing the search warrant, law enforcement agents found two persons inside the residence: COOPER and Individual-1. Law enforcement agents interviewed Individual-1. Individual-1 stated that she and COOPER resided at the apartment. She stated that the area of the apartment where the Computers were located belongs to COOPER and that she does not know the passwords to the Computers. Individual-1 further stated that COOPER builds computers as a hobby.

11. On November 23, 1999, COOPER was sentenced to 41 months' imprisonment, having been convicted in the U.S. District Court for the District of New Jersey of interstate transport of child pornography by computer via the internet, in violation of 18 U.S.C. § 2252(a)(1).

(Continued on following page)

12. On May 27, 2011, COOPER was sentenced to 180 days' imprisonment and 5 years' probation, having been convicted in the Superior Court of New Jersey, Burlington County, of cruelty and neglect of a child, in violation of N.J.S.A. 9:6-3.

This affidavit was sworn out by telephone, in accordance with Federal Rule of Criminal Procedure 4.1

Laura Hurley

Laura Hurley  
Special Agent, Homeland Security Investigations

Date: August 19, 2021

Sharon A. King

HON. SHARON A. KING  
United States Magistrate Judge

Date: August 19, 2021